

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SAMANTHA MURRAY,	*	C.A. No. 06-329-KAJ
	*	
Plaintiff,	*	
	*	
v.	*	
	*	
DOVER DOWNS, INC.,	*	
	*	
Defendant.	*	

**PLAINTIFF'S INITIAL DISCLOSURES MADE PURSUANT TO  
FED. R. CIV. P. 26(a) (1)**

Plaintiff, by and through her attorneys, Schmittinger and Rodriguez, P.A., hereby discloses the information required by Fed. R. Civ. P. 26(a)(1) to Defendant as follows:

A. The following individuals are likely to have discoverable information that Plaintiffs may use to support her claims (but not solely for impeachment):

1. Plaintiff;
2. Melinda Shelton;
3. Cheryl? Messick;
4. George Courtney;
5. Faye Sheranko;
6. Barbara Bell;
7. Lloyd Washington;
8. Faye White;
9. Adrienne McCutchen;
10. Bill Beever; and
11. All individuals named by Defendants in their Initial Disclosures

Pursuant to Federal Rule of Civil Procedure 26(a).

B. The following are all the documents, data compilations, and tangible things in the possession, custody, or control of Plaintiffs that Plaintiff may use to support their claims (but

not solely for impeachment), other than information related to Plaintiffs' damages:

1. Delaware Department of Labor File;
2. U.S. Equal Employment Opportunity Commission File;
3. Dover Downs' Harassment Policy;
4. Short-Term Disability Income Plan of Dover Downs, Inc.;
5. Out of Work Note from Dr. Lillian V. Kraman-Roach;
6. Out of Work Note from Dr. Patricia A. Guarriello;
7. Preventing Sexual Harassment in the Workplace Handout/ Slide Presentation;
8. Letter from Dover Downs, Inc.'s HR Manager, Karen Stanley, to Ms. Murray, dated May 10, 2006 and;
9. Letter from Dover Downs, Inc.'s HR Manager, Karen Stanley, to Ms. Murray, dated May 8, 2006;

C The categories of damages claimed by Plaintiff are as set forth in Plaintiff's Complaint. These damages are not subject to quantification at this point. Evidence regarding damages will be provided in discovery as requested by Defendant.

D. Plaintiff has no obligation for disclosure pursuant to Fed. R. Civ. P. 16(a)(1)(D).

SCHMITTINGER & RODRIGUEZ, P.A.

BY: William D. Fletcher, Jr.  
William D. Fletcher, Jr.  
Bar ID #362

BY: Noel E. Primos  
Noel E. Primos  
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414 S. State Street  
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Dover, DE 19903  
Attorneys for Plaintiff

Dated: 9-5-06  
WDF/clg

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused copies of the following:

**Plaintiff's Initial Disclosures Pursuant to Federal Rule of Civil Procedure 26(a)**

to be served upon:

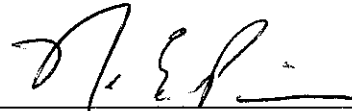
Edward Ellis, Esq.  
123 South Broad Street  
Philadelphia, PA 19109

Noel Burnham, Esq.  
300 Delaware Ave., Suite 750  
Wilmington, DE 19801

by e-filing and mailing regular U.S. mail at the address listed above on September 5, 2006

SCHMITTINGER & RODRIGUEZ, P.A.

BY:



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DATED: 9-5-06  
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